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March 5, 2025

The conference will be moved to **April 1, 2025 at 2:30 PM**. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 7.

## **VIA ECF**

Hon. Arun Subramanian United States District Judge Southern District of New York 500 Pearl Street, Courtroom 15A New York, NY 10007 SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: March 6, 2025

Re: Clifton v. Interbrand NYC, et al.; Index No. 24-CV-9411 (AS)

Your Honor,

Our office represents Plaintiff, Jay Clifton, in the above referenced matter and we write, with Defendants' counsel's consent, to respectfully request an adjournment of the Initial Pre-Trial Conference, which is currently scheduled for March 11, 2025 at 2:00pm.

This adjournment request is based on the fact that Davis+Gilbert LLP, the attorneys who represent DefendantInterbrand NYC, required time to confirm which individual Defendants they would be representing in this matter. As such, Defendants were served with Waivers of the Service of Summons on January 26, 2025. Based on their waiver of service, the deadline for the Defendants whom Davis+Gilbert LLP represents, to respond to Plaintiff's Amended Complaint is March 27, 2025.

Therefore, the parties respectfully jointly request an adjournment of the Initial Pre-Trial Conference to a date after March 27, 2025. This is the first request for an adjournment of this conference and the only other deadline currently set in this matter is that the parties will be required to provide one another the documents and information described in the Initial Discovery Protocols of the Pilot Program for Initial Discovery Protocols for Employment Cases Alleging Adverse Action within thirty (30) days of Defendants' answers or pre-answer motions, if any.

We thank the Court in advance for your time and attention to this matter.

Respectfully Submitted,

Erica T. Healey-Kagan